

**NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,  
RICARDO GONZALES, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 1:17-cv-02246

Judge Edmond E. Chang

Magistrate Judge Sheila Finnegan

**PLAINTIFFS' UNOPPOSED MOTION TO  
SEAL DOCUMENTS FILED IN SUPPORT  
OF PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

Plaintiffs respectfully move the Court for leave pursuant to Local Rule 26.2 to file under seal Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Class Certification (the "Memorandum") and certain exhibits attached to the Declaration of Joseph P. Guglielmo in Support of Plaintiffs' Motion for Class Certification (the "Guglielmo Declaration"). In support of Plaintiffs' motion, which Defendant Walgreen Co. does not oppose, Plaintiffs state the following:

1. Pursuant to Local Rule 26.2(c), "Any party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must: (1) provisionally file the document electronically under seal; (2) file electronically at the same time a public-record version of the brief, motion or other submission with only the sealed document excluded; and (3) move the court for leave to file the document under seal."

2. Plaintiffs' Memorandum contains descriptions of information contained within and quotations from documents and depositions that have been designated as "Confidential" pursuant to Sections 3 and 4 of the Agreed Confidentiality Order (ECF No. 79) (the "Confidentiality Order").

3. Exhibits 2-8 and 58 of the Guglielmo Declaration contain deposition testimony that has been designated as "Confidential" pursuant to Section 4 of the Confidentiality Order.

4. Exhibits 15-46, 48-52, and 55-56 of the Guglielmo Declaration contain information that has been designated as "Confidential" pursuant to Section 3 of the Confidentiality Order.

5. Contemporaneously with this filing, Plaintiffs will publicly file redacted versions of Plaintiffs' Memorandum and Exhibits 2-4, 6-8, and 55-56 of the Guglielmo Declaration.

6. Attached hereto is a Proposed Order granting Plaintiffs' motion.

WHEREFORE, for good cause shown, Plaintiffs hereby respectfully move for leave to file under seal:

- a. the unredacted version of Plaintiffs' Memorandum;
- b. the unredacted versions of Exhibits 2-4, 6-8, and 55-56 of the Guglielmo Declaration; and
- c. Exhibits 5, 15-46, 48-52, and 58 of the Guglielmo Declaration.

Dated: November 17, 2022

Respectfully Submitted,  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

/s/ Joseph P. Guglielmo

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***Local Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joseph P. Guglielmo  
Joseph P. Guglielmo